

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

AMY VELEZ, SONIA KLINGER,	)	
PENNI ZELINKOFF, MINEL HIDER	)	
TOBERTGA, and MICHELLE	)	
WILLIAMS,	)	CLASS ACTION COMPLAINT
	)	
Individually and on Behalf of Others	)	
Similarly Situated,	)	
	)	
PLAINTIFFS,	)	04-Civ.-09194 (GEL)
	)	
v.	)	
	)	
NOVARTIS CORPORATION and	)	
NOVARTIS PHARMACEUTICAL	)	JURY TRIAL DEMANDED
CORPORATION,	)	
	)	
DEFENDANTS.	)	

**CLASS ACTION COMPLAINT**

**I. NATURE OF THIS ACTION**

1. Amy Velez, Sonia Klinger, Penni Zelinkoff, Minel Hider Tobertga and Michelle Williams ("Class Representatives") bring this action against Defendants Novartis Corporation and Novartis Pharmaceuticals Corporation (jointly "Novartis" or "Defendants") to redress gender discrimination in employment. Specifically, the Class Representatives, all of whom are present or former employees of Novartis, bring this class action against Novartis on behalf of themselves and all other female employees of Novartis who are similarly situated pursuant to Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000(e)-5(f), et seq., as amended ("Title VII"). The Class Representatives have worked and/or continue to work for Novartis throughout the United States, including the Washington, D.C. area; St. Louis and Kansas City, Missouri; Portland, Oregon;

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

AMY VELEZ, SONIA KLINGER,	)	AMENDED CLASS ACTION
PENNI ZELINKOFF, MINEL HIDER	)	
TOBERTGA, MICHELLE WILLIAMS,	)	
JENNIFER WAXMAN-RECHT,	)	COMPLAINT
KAREN LIGGINS, LORI HORTON,	)	
HOLLY WATERS, STEPHANIE	)	
CATES, WENDY PINSON and	)	
ROBERTA VONLINTEL,	)	
	)	04 Civ. 09194 (GEL)
Individually and on Behalf of Others	)	
Similarly Situated,	)	
	)	
PLAINTIFFS,	)	JURY TRIAL DEMANDED
	)	
v.	)	
	)	
NOVARTIS CORPORATION and	)	
NOVARTIS PHARMACEUTICAL	)	
CORPORATION,	)	
	)	
DEFENDANTS.	)	

AMENDED CLASS ACTION COMPLAINT

I. NATURE OF THIS ACTION

1. Twelve women who work or have worked for Novartis in twelve states and Washington, D.C. bring this action against Defendants Novartis Corporation and Novartis Pharmaceuticals Corporation (jointly "Novartis" or "Defendants") to redress gender discrimination in employment. Specifically, Amy Velez, Sonia Klinger, Penni Zelinkoff, Minel Hider Tobertga, Michelle Williams, Jennifer Waxman-Recht, Karen Liggins, Lori Horton, Holly Waters, Stephanie Cates, Wendy Pinson and Roberta VonLintel, the Class Representatives ("Class Representatives"), all of whom are present or former employees of Novartis, bring this

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

AMY VELEZ, SONIA KLINGER,	)	
PENNI ZELINKOFF, MINEL HIDER	)	SECOND AMENDED
TOBERTGA, MICHELLE WILLIAMS,	)	
JENNIFER WAXMAN-RECHT,	)	CLASS ACTION COMPLAINT
KAREN LIGGINS, LORI HORTON,	)	
HOLLY WATERS, STEPHANIE	)	
CATES, WENDY PINSON, ROBERTA	)	
VONLINTEL, ASHLEY NARMOUR,	)	
CATHERINE WHITE, KELLY	)	04 Civ. 09194 (GEL)
CORBETT, SUE EARL, JAMIE	)	
HOLLAND, JOAN DURKIN, SIMONA	)	
LOPES, MARYANNE JACOBY,	)	
MARTA DEYNE, and DONNA	)	
MARTIN,	)	JURY TRIAL DEMANDED
	)	
Individually and on Behalf of Others	)	
Similarly Situated,	)	
	)	
PLAINTIFFS,	)	
	)	
v.	)	
NOVARTIS CORPORATION,	)	
NOVARTIS PHARMACEUTICALS	)	
CORPORATION, and THOMAS	)	
EBELING,	)	
	)	
DEFENDANTS.		

**SECOND AMENDED CLASS ACTION COMPLAINT**

**I. NATURE OF THIS ACTION**

1. Twenty-two (22) women who work or have worked for Novartis in New York and sixteen (16) other states, as well as Washington, D.C., in the United States and in Europe bring this action against Corporate Defendants Novartis Corporation and Novartis Pharmaceuticals Corporation (jointly "Novartis" or "Corporate Defendants") and against

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

AMY VELEZ, SONIA KLINGER,	)	
PENNI ZELINKOFF, MINEL HIDER	)	THIRD AMENDED
TOBERTGA, MICHELLE WILLIAMS,	)	
JENNIFER WAXMAN-RECHT,	)	CLASS ACTION COMPLAINT
KAREN LIGGINS, LORI HORTON,	)	
HOLLY WATERS, STEPHANIE	)	
CATES, WENDY PINSON, ROBERTA	)	
VONLINTEL, ASHLEY NARMOUR,	)	
CATHERINE WHITE, KELLY	)	04 Civ. 09194 (GEL)
CORBETT, SUE EARL, JAMIE	)	
HOLLAND, JOAN DURKIN, SIMONA	)	
LOPES, MARYANNE JACOBY	)	
and MARTA DEYNE,	)	
	)	JURY TRIAL DEMANDED
<b>Individually and on Behalf of Others</b>	)	
<b>Similarly Situated,</b>	)	
	)	
<b>PLAINTIFFS,</b>	)	
	)	
v.	)	
NOVARTIS CORPORATION,	)	
NOVARTIS PHARMACEUTICALS	)	
CORPORATION, and THOMAS	)	
EBELING,	)	
	)	
<b>DEFENDANTS.</b>	)	

**THIRD AMENDED CLASS ACTION COMPLAINT**

**I. NATURE OF THIS ACTION**

1. Twenty-one (21) women who work or have worked for Novartis in New York and sixteen (16) other states, as well as Washington, D.C., bring this action against Corporate Defendants Novartis Corporation and Novartis Pharmaceuticals Corporation (jointly "Novartis" or "Corporate Defendants") and against Defendant Thomas Ebeling ("Ebeling") (collectively "Defendants") to redress gender discrimination in employment. Specifically, Amy Velez, Sonia

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

AMY VELEZ, PENNI ZELINKOFF,	)	
MINEL HIDER TOBERTGA,	)	FOURTH AMENDED
MICHELLE WILLIAMS, JENNIFER	)	
WAXMAN-RECHT, KAREN LIGGINS,	)	CLASS ACTION COMPLAINT
LORI HORTON, HOLLY WATERS,	)	
WENDY PINSON, ROBERTA	)	
VONLINTEL, ASHLEY NARMOUR,	)	
CATHERINE WHITE, KELLY	)	
CORBETT, SUE EARL, JAMIE	)	04 Civ. 09194 (GEL)
HOLLAND, JOAN DURKIN, SIMONA	)	
LOPES, MARYANNE JACOBY	)	
and MARTA DEYNE,	)	
Individually and on Behalf of Others	)	JURY TRIAL DEMANDED
Similarly Situated,	)	
PLAINTIFFS,	)	
v.	)	
NOVARTIS CORPORATION,	)	
NOVARTIS PHARMACEUTICALS	)	
CORPORATION, and THOMAS	)	
EBELING,	)	
DEFENDANTS.	)	
	)	

**FOURTH AMENDED CLASS ACTION COMPLAINT**

**I. NATURE OF THIS ACTION**

1. Nineteen (19) women who work or have worked for Novartis in New York and sixteen (16) other states, as well as Washington, D.C., bring this action against Corporate Defendants Novartis Corporation and Novartis Pharmaceuticals Corporation (jointly "Novartis" or "Corporate Defendants") and against Defendant Thomas Ebeling ("Ebeling") (collectively "Defendants") to redress gender discrimination in employment. Specifically, Amy Velez, Penni